

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No: 04-40190-FDS

COLLEEN O'DONNELL, )  
Plaintiff, )  
 )  
v. )  
 )  
ALBERTO R. GONZALES, ATTORNEY )  
GENERAL, U.S. DEPARTMENT )  
OF JUSTICE, )  
Defendant, )

**PLAINTIFF'S ASSENTED TO MOTION TO EXTEND TIME TO FILE AN  
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND  
MEMORANDUM IN SUPPORT THEREOF**

Now comes the Plaintiff in the above-entitled matter and hereby requests this Honorable Court to allow the Plaintiff's Assented to Motion to Extend Time to File an Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support thereof.

As reasons therefor, the Plaintiff's counsel states that her schedule for the rest of the month of March, 2006, is extremely busy. Plaintiff's counsel has at least nine (9) depositions scheduled prior to March 31, 2006, none of which can be postponed.

Additionally, the Defendants' Motion for Summary Judgment and Memorandum in Support thereof are extremely lengthy and voluminous documents. The memorandum and Statement of Facts consist of sixty (60) pages together with sixty-nine (69) exhibits. Plaintiff's counsel has to extensively review all of the facts and documents in order to respond to same.

Over 6,000 documents have been produced through discovery in this case. Plaintiffs' counsel must review an extensive amount of material in order to respond to Defendants' motion.

Moreover, the deposition of the Defendants' expert was conducted on March 14, 2006, and, as such, Plaintiff's counsel is not in receipt of the transcript of same at this time.

WHEREFORE, Plaintiff's counsel requests this Honorable Court allow Plaintiff's Assented to Motion to Extend Time to File an Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support Thereof.

The Plaintiff  
Colleen O'Donnell

Dated: March 17, 2006

By her Attorney

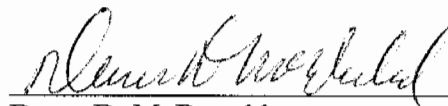


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**CERTIFICATE OF SERVICE**

I, Dawn D. McDonald, hereby certify that I caused the foregoing to be served upon the Defendant by electronically filing a copy thereof on this 17<sup>th</sup> day of March, 2006, as follows:

Damian Wilmot, Esq.  
Assistant U.S. Attorney  
John Joseph Moakley Federal Court  
One Courthouse Way, Suite 9200  
Boston, MA 02210



Dawn D. McDonald

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